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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PARADISE ENTERTAINMENT LIMITED, a  
Bermuda corporation; LT GAME, INC., a  
Nevada corporation; and LT GAME LIMITED, a  
British Virgin Islands corporation,

Plaintiffs/Counterdefendants,

vs.

EMPIRE TECHNOLOGICAL GROUP  
LIMITED, a Nevada corporation; GAMING  
SPECIALIZED LOGISTICS LLC, a Nevada  
limited liability company; LINYI FENG, an  
individual; ROY KELCEY ALLISON, an  
individual; DARYN KIELY, an individual; and  
YI ZHAO, an individual,

Defendants/Counterclaimants.

Case No. 2:24-cv-00428-JCM-BNW

**DECLARATION OF  
JEAN-PAUL CIARDULLO IN SUPPORT  
OF PLAINTIFFS' OPPOSITION TO  
DEFENDANT YI ZHAO'S  
MOTION TO DISMISS**

1 I, Jean-Paul Ciardullo, declare as follows:

2 1. I am an attorney with the law firm Foley & Lardner LLP, counsel to Plaintiffs Paradise  
3 Entertainment Limited (“Paradise”), LT Game, Inc. (“LT Game”), and LT Game Ltd. (“LTG Limited”).

4 2. On the week on February 17, 2025, my team conferred with Defendants’ counsel about  
5 Plaintiffs’ planned amendment to add Ms. Zhao to the case, and supplied Defendants with a draft of the  
6 First Amended Complaint (“FAC”) on February 25. Defendants did not oppose the filing of the FAC, and  
7 to the best of my recollection, Defendants did not raise any personal jurisdiction concerns. The parties  
8 contemporaneously filed a Joint Stipulation to extend the case schedule in which they jointly contemplated  
9 that the requested schedule extension would allow time for Ms. Zhao to appear in the case and participate  
10 in discovery prior to the new discovery cutoff of August 29, which was a subject the parties had discussed  
11 during their meet and confer phone calls. (Dkt. 66 at 2:6-9.) Defendants’ counsel subsequently confirmed  
12 that they would be representing Ms. Zhao and agreed to execute a waiver of formal service in exchange  
13 for additional time in which to respond to the FAC. To the best of my recollection, Defendants still did  
14 not raise any personal jurisdiction concerns.

15 3. Attached as Exhibit A is a copy of a document produced by Defendants with beginning  
16 Bates number ETG\_00000167357.

17 4. Attached as Exhibit B is a copy of a document produced by Defendants with beginning  
18 Bates number ETG\_00000215821.

19 5. Attached as Exhibit C is a copy of a document produced by Defendants with beginning  
20 Bates number ETG\_00000214259.

21  
22 I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.  
23

24  
25 Dated: May 27, 2025



26 Jean-Paul Ciardullo  
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